UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS WICHITA FALLS DIVISION

IN RE:	§
	§
HIGH PLAINS RADIO NETWORK,	§ CASE NO. 24-70089
LLC,	§
DEBTOR.	§
	§

NOTICE OF HEARING

Please take notice that an expedited hearing has been set for MAY 28, 2024 AT 1:30 P.M. before the Honorable Scott W. Everett, United States Bankruptcy Judge regarding the matters referenced and described below. The hearing will be conducted at Judge Everett's Courtroom, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242.

The WebEx hearing instructions for the Court are attached below.

For WebEx Video Participation/Attendance:	https://us-courts.webex.com/meet/everett				
For WebEx Telephonic Participation/Attendance:	Dial-In: 1-650-479-3207 Access Code: 476 420 189				

Filing Date	Docket Text						
04/01/2024	11 (29 pgs; 2 docs) Motion to use cash collateral Emergency Motion Filed by Debtor High Plains Radio Network, LLC <i>(previously noticed with / in order)</i>						
04/02/2024	13 (16 pgs; 2 docs) Motion to maintain bank accounts. Filed by Debtor High Plains Radio Network, LLC <i>(previously noticed with / in order)</i>						
04/25/2024	57 (20 pgs; 2 docs) Application to employ Weycer Kaplan Pulaski Zuber PC as Attorney Filed by Debtor High Plains Radio Network, LLC						
05/01/2024	72 (17 pgs; 2 docs) Application to employ Media Services Group as Broker Filed by Debtor High Plains Radio Network, LLC						

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Dated: May 1, 2024 Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

JEFF CARRUTH (TX SBN: 24001846)

2608 Hibernia, Suite 105 Dallas, TX 75204-2514 Telephone: (713) 341-1158

Fax: (713) 961-5341

E-mail: jcarruth@wkpz.com

PROPOSED ATTORNEYS FOR HIGH PLAINS RADIO NETWORK, LLC, DEBTOR AND DEBTOR IN POSSESSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on May 1, 2024 (1) by electronic notice to all ECF users who have appeared in this case to date, and/or as set forth below and (2) by regular mail to all parties appearing in the attached service list.

COPIES OF THE EXHIBITS WERE NOT SERVED BY REGULAR MAIL. PLEASE CONTACT THE UNDERSIGNED IF YOU WISH TO RECEIVE THE EXHIBITS.

/s/Jeff Carruth	
Jeff Carruth	

ECF SERVICE LIST

24-70089-swe11 Notice will be electronically mailed to:

Jeffery D. Carruth on behalf of Debtor High Plains Radio Network, LLC jcarruth@wkpz.com,

<u>icarruth@aol.com;atty_carruth@trustesolutions.com;carruthjr87698@notify.bestcase.com;ATTY_CARRUTH@bluestylus.com;icarruth@ecf.courtdrive.com</u>

Paul H. Cross on behalf of Creditor Hanmi Bank phclease@msn.com

Shanna M. Kaminski on behalf of Interested Party Union Funding Source, Inc. skaminski@kaminskilawpllc.com

Sherrel K. Knighton on behalf of Creditor Malakoff ISD Sherrel.Knighton@lgbs.com, Dora.Casiano-

Perez@lgbs.com;Sean.French@lgbs.com;Eva.Parker@lgbs.com;Alexis.Hall@lgbs.com;Dallas.Bankruptcy@lgbs.com

Matthew F. Kye on behalf of Creditor Amur Equipment Finance, Inc. mkye@kyelaw.com, dsullivan@kyelaw.com, dsullivan@kyelaw.com,

Julie Anne Parsons on behalf of Creditor Eastland County Appraisal District jparsons@mvbalaw.com,

kalexander@mvbalaw.com;theresa.king@mvbalaw.com;juanie.montalvo@mvbalaw.com

Julie Anne Parsons on behalf of Creditor The County of Henderson, Texas jparsons@mvbalaw.com,

kalexander@mvbalaw.com;theresa.king@mvbalaw.com;juanie.montalvo@mvbalaw.com

Julie Anne Parsons on behalf of Creditor The County of Stephens, Texas jparsons@mvbalaw.com,

kalexander@mvbalaw.com;theresa.king@mvbalaw.com;juanie.montalvo@mvbalaw.com

Scott M. Seidel -SBRA V scott@scottseidel.com, csms11@trustesolutions.net;susan.seidel@earthlink.net

Dawn Whalen Theiss on behalf of Creditor Small Business Administration dawn.theiss@usdoj.gov,

brooke.lewis@usdoj.gov;CaseView.ECF@usdoj.gov

United States Trustee <u>ustpregion06.da.ecf@usdoj.gov</u>

David Weitman on behalf of Creditor Vertical Bridge REIT, LLC david.weitman@klgates.com

SERVICE LIST

	A	В	С	D	E	F	G	Н	
1	SERVICE LIST	Case No. 22-51323	In re: Kuberlaxmi, LLC		•		UPDATED:	4/30/2024	
2	C:\Users\jcarruth\ND Office Echo\VAULT-	C9SL7ZTY\[service list (hprn) 001 4878-4499-4995 v.8	3.xlsx]Sheet1						
3	Name	Address1	Address2	Address3	City	State	Zip	Email	Method of Servic
	BMI	PO Box 630893			Cincinnati	ОН	45263-0893		Regular Mail
	Broadcase Music, Inc.	7 World Trade Center	250 Greenwich St		New York	NY	10007	renriquez-cohen@bmi.com	NOA-ECF
6	Bryn Mawr Equipment Finance Inc.	801 Lancaster Avenue			Bryn Mawr	PA	19010-3305		Regular Mail
	Channel Partners Capital LLC	Attn Legal Department	1111 E College Drive	Suite 200	Marshall	MN	56258-1968		Regular Mail
	City of Altus	509 S Main St 623 Main St			Altus	DK TX	73521-3135 79035		Regular Mail Regular Mail
	City of Friona City of Hereford	PO Box 2277			Friona Hereford	TX	79045-2277		Regular Mail
	City of Plainview	202 W 5th			Plainview	TX	79072-8232		Regular Mail
12	City of Vernan	1725 Wilbarger St			Vernon	TX	76384-4741		Regular Mail
	Crest Capitol	PO Box 88233			Atlanta	GA	30356-8233		Regular Mail
	CT Carp. Sys.	Attn: SPRS	330 N Brand Blvd		Glendale	ĊA	91203-2308		Regular Mail
15	D&D Telecommunications	PO Box 6988			Abilene	TX	79608		Regular Mail
	Eastland County Appraisal District	c/o Julie Parsons	McCreary, Veselka, Bragg & Allen, PC	P.O. Box 1269	Round Rock	TX	78680-1269	jparsons@mvbalaw.com	NOA-ECF
٦	Eastland County Appraisal District	c/o Julie Anne Parsons	PO Bax 1269		Round Rock	TX	78680-1269	julie.parsons@mvbalaw.com	NOA-ECF
17		McCreary, Veselka, Bragg & Allen, P.C.	1 0 0 0 x 120 9			_			
18	Entergy Utility	PO Box 8105			Baton Rouge	LA	70891-8105		Regular Mail
	Federal Communications Com.	45 L Street NE			Washington		20554-0001		Regular Mail
20	Financial Agent Services First State Bank Athens	PO Box 2576	+	+	Springfield	IL	62708-2576	-	Regular Mail
		PO Bax 471	_		Athens	TX	75751-0471		Regular Mail
22 23	Global Music Rights	1801 W Olympic Blvd			Pasadena	CA	91199-2280		Regular Mail
	Hamni Bank Hanmi Bank	5403 Olympic Dr. #200 1107 E Pioneer Parkway		_	Gig Harbor Arlington	TX	98335-1853 76010-5866		NOA-ECF NOA-ECF
	Hanmi Bank	Attn. Paul Cross Esq.	11300 N. Central Expressway Ste. 604		Dallas	TX	75243	nhdease@msn.com	NOA-ECF NOA-ECF
26	Hanmi Bank	11300 North Central Expressway	Suite 604	+	Dallas	TX	75243	SHOREST THE RESIDENT	NOA-ECF
	Hanszen LaPorte	14201 Memorial Dr	Suite out	 	Houston	TX	77079-6731	processed marcon	Regular Mail
	High Plains Radio Network, LLC	PO Box 1419			Vernon	TX	76385-1419		Regular Mail
	Hitachi Capital America Corp.	7808 Creekridge Circle	Suite 250		Edina	MIN	55439-2647		Regular Mail
	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7317		Philadelphia	PA	19101-7317		Regular Mail
	leffery D. Carruth	Weycer Kaplan Pulaski & Zuber, P.C.	2608 Hibernia	Suite 105	Dallas	TX	75204-2514	icarruth@wkpz.com	Regular Mail
	Liberty Mutual Insurance	175 Berkeley Street			Boston	MA	02116-3350		Regular Mail
33	Lift Systems	PO Box 7233			Abilene	TX	79608		Regular Mail
34	Litefund Solutions	99 Wall St #2613			New York	NY			Regular Mail
35	M Properties Malakoff ISD	2627 West Road	27774 04		Mtn. Home	AR TX	72653		Regular Mail
	Malakoff ISD	Linebarger Goggan Blair & Sampson, LLP	2777 N. Stemmons Freeeway, Suite 1000 c/o Sherrel K Knighton	2777 N Stemmons Fwy, Ste. 1000	Dallas Dallas	TX	75207 75207-2328	dallas.bankruptcy@lgbs.com Sherrel.Knighton@lgbs.com	NOA-ECF NOA-ECF
	Marlin Lease Corp	Linebarger Goggan Blair & Sampson, LLP 300 Fellowship Rd	CO Sherrerk knighton	2777 N Sterimons Pwy, Sec. 1000	Mount Laurel	N)	08054	Sherrer.Kriightonprigos.com	Regular Mail
	Marlin Leasing Corp	300 Fellowship Rd	+	<u> </u>	Mount Laurel	NJ.	08054-1727		Regular Mail
	Media Facilities	1740 Dell Range Blvd. #418			Chevenne	WY	82009-4961		Regular Mail
	Meridian	367 Eagleview Blvd.			Exton	PA	19341-1156		Regular Mail
	Meridian Equipment Finance LLC	9 Old Lincoln Highway			Malvern	PA	19355-2551		Regular Mail
	Meridian Equipment Finance, LLC	c/o Saldutti Law Group	1040 Kinsg Highway N, Ste. 100		Cherry Hill	NJ.	08034	rmcdoweli@sigcollect.com	NOA-ECF
	Midland States Bank	1801 Park 270 Drive	Suite 200		St. Lauis	MO	63146-4022		Regular Mail
	Mitsubishi HC	7201 Metro Blvd. Ste 800			Edina	MIN	55439-1333		Regular Mail
	Mitsubishi HC Capital America, Inc.	c/o Jason Sellers	825 Nicollet Mall, Suite 1648		Minneapolis	MN	55400	jacob@greensteinsellers.com	NOA-ECF
	Monte Spearman	4837 Silverwood Dr.			Johnstown	co	80534		direct email
48	Monte Spearman	PO Box 3649		+	Palestine	TX	75802	-	Regular Mail
49 50	New Lane Fin. B-M	801 Landcaster Ave		+	Bryn Mawr	PA	19010-3305	-	Regular Mail
	North Arkansas Electric Optimum Telephone	PO Box 1000 1111 Stewart Ave.		+	Salem Bethpage	AR	72576-1000 11714-3581		Regular Mail Regular Mail
	Pawnee	3801 Automation Way #207		+	Ft Collins		80525-5735	 	Regular Mail Regular Mail
	SBA Covid-19 Disaster Loan	PO Box 3918		+	Portland		97208-3918	 	NOA-ECF
54	Scott M. Seidel -SBRA V	Seidel Law Firm	6505 West Park Blvd	Suite 306	Plano	TX	75093-6212	scott@scottseidel.com	NOA-ECF
55	SecureNet	101 N Federal HWY Ste 601		1	Boca Raton	FL	33432-3969		Regular Mail
56	SESAC	PO Bax 5246			New York	NY	10008-5246		Regular Mail
57	South Plains Communications	5811 34th St			Lubbock	TX	79407		Regular Mail
58	Summit	4680 Parkway Dr#300			Mason	OH	45040-7979		Regular Mail
59	Summit Natural Gas	PO Box 676358			Dallas	TX	75267-6358		Regular Mail
60	Texas Comptroller	Rev Acct Div - Bankruptcy Section	PO Box 13528		Austin	TX	78711-3528		Regular Mail
61	The County of Henderson, Texas	c/o Julie Anne Parsons	McCreary Veselka Bragg & Allen, P.C.	P.O. Box 1269	Round Rock	TX	78680-1269	parsons@mvbalaw.com	NOA-ECF
_]	The County of Henderson, Texas	c/o Julie Anne Parsons	PO Box 1269		Round Rock	TX	78680-1269	fulle.parsons@mvbalaw.com	NOA-ECF
62		McCreary, Veselka, Bragg & Allen, P.C.				-	70.000 4 8.00		
63	The County of Stephens, Texas	c/o Julie Anne Parsons	McCreary Veselka Bragg & Allen, P.C.	P.O. Box 1269	Round Rock	TX	78680-1269	iparsons@mvbalaw.com	NOA-ECF

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1	SERVICE LIST	Case No. 22-51323	In re: Kuberlaxmi, LLC			UPDATED:		4/30/2024		
2	C:\Users\jcarruth\ND Office Echo\VAULT-C9S	th\ND Office Echo\VAULT-C9SL7ZTY\[service list (hprn) 001 4878-4499-4995 v.8.xlsx]Shee		neet1						
3	Name	Address1	Address2	Address3	City	State	Zip	Email	Method of Service / Comment	
64		c/o Julie Anne Parsons McCreary, Veselka, Bragg & Allen, P.C.	PO Box 1269		Round Rock	TX	78680-1269	julie.parsons@mvbalaw.com	NOA-ECF	
65	The Fundworks	299 S. Main St. #1300			Salt Lake City	UT	84111-2241		Regular Mail	
66	The Fundworks LLC	c/o Dedicated Financial GBC	4000 Lexington Ave N, Suite 125		Shareview	MN	55126	bankruptcy@dedicatedgbc.com	NOA-ECF	
67	Titan Tower	PO Box 6972			Abilene	TX	79608		Regular Mail	
68	Turbo Capital	2308 N Market St			Wilmington	DE	19802-4230		Regular Mail	
69	TXU Utility	PO Box 650638			Dallas	ΤX	75265-0638		Regular Mail	
70	U.S. Bank Equipment Finance	1310 Madrid Street			Marshall	MN	56258-4099		Regular Mail	
71	U.S. Small Business Admin	150 Westpark Way	Suite 130		Euless	ΤX	76040	rebekah.osullivan@sba.gov	NOA-ECF	
72	U.S. Small Business Administration	1545 Hawkins Blvd Ste 202			El Paso	ΤX	79925-2654		NOA-ECF	
73	U.S. Small Business Administration	c/o Dawn Whalen Theiss	1100 Commerce St Ste 300		Dallas	TX	75242	dawn.theiss@usdoj.gov	NOA-ECF	
74	United First LLC	2999 NE 191st St			Miami	FL	33180-3123		Regular Mail	
75	United Funding	1835 E Hollandale Beach BLVD			Hollandale Beach	FL	33009-4619		NOA-ECF	
76	United Funding	Shanna M. Kaminski	Kaminski Law, PLLC	P.O. Box 247	Grass Lake	MI	49240	skaminski@kaminskilawpllc.com	NOA-ECF	
77	United States Trustee	1100 Commerce Street	Room 976		Dallas	TX	75242-0996	erin.schmidt2@usdoi.gov	NOA-ECF	
78	Verizon Cell Phone	PO Box 660108			Dallas	ΤX	75266-0108		Regular Mail	
79	Vertical Bridge REIT LLC	750 Park of Commerce Dr #200			Boca Raton	FL	33487-3650		NOA-ECF	
80	Vertical Bridge REIT LLC	Brandy A. Sargent	K&L Gates	One SW Columbia St., Ste 1900	Portland	OR	97204	brandy.sargent@klgates.com	NOA-ECF	
81	Vertical Bridge REIT LLC	David Weitman	K&L Gates	1717 Main Street Suite 2800	Dallas	ΤX	75201	david.weitman@klgates.com	NOA-ECF	
82	Xcel Energy	Attn Bankruptcy Department	Po Box 9477		Minneapolis	MN	55484-0001		Regular Mail	
83	Zula Com	PO Box 3649			Palestine	TX	75802-3649		direct email	

service list (hpm) 001 4878-4499 4995 v.8.xisx, Sheet1 Page 2 of 2 4/30/2024, 11:27 PM

WebEx Hearing Instructions Judge Scott W. Everett

Pursuant to General Order 2023-05 issued by the Court on September 19, 2023, hearings before Judge Scott W. Everett will be conducted pursuant to the guidelines set forth in the General Order unless ordered otherwise.

For WebEx Video Participation/Attendance:

Link: https://us-courts.webex.com/meet/everett

For WebEx Telephonic Only Participation/Attendance:

Dial-In: 1-650-479-3207; Access code: 476 420 189

Participation/Attendance Requirements:

- Counsel and other parties-in-interest who plan to actively participate in the hearing are encouraged to attend the hearing in the WebEx video mode using the WebEx video link above. Counsel and other parties-in-interest who will <u>not</u> be seeking to introduce any evidence at the hearing and who wish to attend the hearing in a telephonic-only mode may attend the hearing in the WebEx telephonic-only mode using the WebEx dial-in and access code above.
- Attendees should join the WebEx hearing at least 10 minutes prior to the hearing start time. Please be advised that a hearing may already be in progress. <u>During hearings participants are required to keep</u> their lines on mute when they are not addressing the Court or otherwise actively participating in the hearing. The Court reserves the right to disconnect or place on permanent mute any attendee that causes any disruption to the proceedings. For general information and tips with respect to WebEx participation and attendance, please see Clerk's Notice 20-04: https://www.txnb.uscourts.gov/sites/txnb/files/hearings/Webex%20Information%20and%20Tips_0.pdf
- Witnesses are required to attend the hearing in the WebEx video mode, and live testimony will
 only be accepted from witnesses who have the WebEx video function activated. Telephonic
 testimony without accompanying video will not be accepted by the Court. The Court may consider
 special requests for other appearance options on a case-by-case basis.
- All WebEx hearing attendees are required to comply with Judge Everett's Telephonic and Videoconference Hearing Policy (included within Judge Everett's Judge-Specific Guidelines): https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-everetts-hearing-dates.

Exhibit Requirements:

- Any party intending to introduce documentary evidence at the hearing <u>must</u> file an exhibit list in the
 case with a true and correct copy of each designated exhibit filed as a <u>separate</u>, <u>individual</u> <u>attachment</u>
 thereto so that the Court and all participants have ready access to all designated exhibits.
- In addition, for evidentiary hearings, when more than ten exhibits have been filed in ECF or when the total page count of all exhibits exceeds 500 pages, Judge Everett requests a thumb/USB drive be delivered to him prior to the hearing at: U.S. Bankruptcy Court, Attn: Stephen Manz, 1100 Commerce Street, Room 1254, Dallas, TX 75242.
- Paper copies of exhibits are not encouraged; however, paper copies may be provided to the witness(s) at an in-person hearing if preferred.

Notice of Hearing Content and Filing Requirements:

IMPORTANT: For all hearings that will be conducted by WebEx only:

• The Notice of Hearing filed in the case and served on parties in interest must: (1) provide notice that the hearing will be conducted by WebEx videoconference only, (2) provide notice of the aboveWebEx video participation/attendance link, and (3) attach a copy of these WebEx HearingInstructions or provide notice that they may be obtained from Judge Everett's hearing/calendar site: https://www.txnb.uscourts.gov/judges-info/hearing-dates/judge-everetts-hearing-dates.

• When electronically filing the Notice of Hearing via CM/ECF select "at https://us-courts.webex.com/meet/everett" as the location of the hearing (note: this option appears immediately after the first set of Wichita Falls locations). Do <a href="https://notestarchitecture.notestar

CONNECTION INSTRUCTIONS FOR PARTICIPATING IN A WEBEX VIRTUAL HEARING

The Court will allow participation in a virtual hearing using either of the following two methods. Please connect at least 10 minutes prior to the hearing time. It is recommended that attorneys discuss the logistics of the WebEx appearance with their clients/witnesses at least 48 hours before the hearing.

Option 1: Using the WebEx app on your smartphone, tablet, laptop, or desktop.

Please connect using only one device. Using two or more devices may cause audio feedback issues.

If using a phone or tablet for video, it should be set in a stationary position. Holding a phone or tablet in your hand while speaking does not yield a good video for the court.

NOTE: If you are experiencing audio issues when using the WebEx application, you may use the "Call Me At" selection under "Audio Connection" to move just the audio portion of the WebEx conference to your telephone.

Option 2: Call in via phone (audio only).

Webex dial-in number: 1-650-479-3207 (access code: 476 420 189).

HELPFUL HINTS AND ETIQUETTE

- Please use the mute function when you are not speaking. Please be aware that sometimes the court
 mutes everyone when there is background noise. When you want to speak, make sure you are not on
 mute. Call-in users should dial *6 to unmute your line.
- Remember to state your name for the record each time before speaking and speak slowly and clearly so the Court can get a good record.
- Use headphones whenever possible, especially if using a desktop PC with external speakers. We have
 foundthat newer iPhones provide the best visual and audio feed better than most desktop computers.

 If you are on a personal computer, headphones or earbuds are required for those who need to speak
 during the hearing.
- During examination, attorneys and witnesses should use a separate camera and microphone when
 possible. To avoid feedback, parties using separate devices must not be in the same room. The Court
 may consider special requests on a case-by-case basis.
- WebEx participants may use the "share" button to easily share their screen or document with the Court or other WebEx participants. Press "stop sharing" to remove the presentation from the meeting.
- When making an appearance from a vehicle, please park in a safe location with windows rolled up (to minimize background distraction and noise) and use a headset that is ear-to-phone (not the vehicle's hands-free speaker-phone option).
- Suggestions for participating in a WebEx hearing from home: If you are having connectivity
 problems, turn off devices that may be using bandwidth on your home network. Devices or
 applications such as Facetime, Roku, streaming media players, video games, or large downloads can
 negatively impact the audio and video quality of the WebEx meeting.
- Participants are reminded that they should wear attire suitable for court.
- Participants who wish to test their WebEx connection or the share screen functionality in advance of the hearing may arrange a "practice run" by contacting the courtroom deputy.

EXHIBITS AND DEMONSTRATIVE AIDS

Exhibits should be filed ahead of time by the date that they would normally be exchanged pursuant to our local rules using the "list (witness/exhibit/generic)" OR "notice (generic)" OR "Support/Supplemental document" event in ECF.

Demonstrative aids and Power Points should also be filed prior to the hearing, if possible. If not, WebEx has the ability to allow you to share your screen, or a particular document, with everyone in the hearing. If these documents are admitted as exhibits, they would then have to be filed after the hearing.

- During the hearing, lawyers can refer to (and offer) their exhibits by referencing the exhibit's docket number for the court and all to access. After the hearing, the court will create a Minute Entry reflecting which exhibits were admitted. You should consider emailing exhibits to witnesses ahead of time since they may not have access to PACER.
- In addition for evidentiary hearings, when more than ten exhibits have been filed in ECF or when the total page count of all exhibits exceeds 500 pages, Judge Everett requests a thumb/USB drive be delivered to him prior to the hearing at: U.S. Bankruptcy Court, Attn: Stephen Manz, 1100 Commerce Street, Room 1254, Dallas, TX 75242.
- Paper copies of exhibits are not encouraged; however, paper copies may be provided to the witness(s) at an in-person hearing if preferred.